

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

WANDA ROSS	:	CIVIL ACTION NO.
	:	
Plaintiff,	:	
	:	2:22-CV-00026-KSM
v.	:	
	:	
VIRGINIA TRANSPORTATION CORP.	:	
	:	
	:	
Defendant.	:	

**STIPULATION TO DISMISS NEGLIGENT ENTRUSTMENT AND TRANSFER
VENUE TO THE DISTRICT OF NEW JERSEY**

Plaintiff, Wanda Ross and Defendant, Virginia Transportation Corp. hereby enter into the following Stipulation:

This civil action involves an accident occurring in Egg Harbor, New Jersey, Plaintiff is an Egg Harbor, New Jersey resident and Defendant has a principal place of business in Rhode Island.

This civil action is transferred to the United States District Court for the District of New Jersey by agreement of the parties and pursuant to 28 U.S.C. section 1406(a).

Plaintiff's claim for negligent entrustment and the entirety of Count I paragraphs 12 through 18 of the complaint are dismissed without prejudice.

Virginia Transportation Corp. admits that the Virginia Transportation Corp. truck driver allegedly involved in the accident was acting within the course and scope of employment.

SIMON & SIMON, P.C.

/s/ Roman Galas

Roman Galas, Esquire
18 Campus Blvd., Suite 798
Newtown Square, PA 19073
Attorney for Plaintiff,
Wanda Ross

Date: February 10, 2022

MARSHALL DENNEHEY

Thomas J. McKenzie, Jr.

Thomas J. McKenzie, Jr., Esquire
2000 Market Street, Suite 2300
Philadelphia, PA 19103
Attorney for Defendant,
Virginia Transportation Corp.

Date: February 10, 2022

U.S.D.J. KAREN S. MARSTON